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Pro Se 7 (Rev. 12/16) Complaint for Employment Discrimination

## UNITED STATES DISTRICT COURT

for the

Middle District of Georgia



Macon Division

Julius Trimble

)	Case No.	<u>5:22-cv-00070-TES</u>
)	(to be filled in by the Clerk's Office)	

*Plaintiff(s)*

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Fort Valley State University  
Valarie Bass  
Komanduri Murty  
Gregory Ford

)	Jury Trial: (check one)
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<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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*Defendant(s)*

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

## COMPLAINT FOR EMPLOYMENT DISCRIMINATION

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Julius Trimble
Street Address	132 Linda Kay Court
City and County	Warner Robins, Houston
State and Zip Code	Georgia, 31088
Telephone Number	4784479458
E-mail Address	juliustrimble@cox.net

## B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (*if known*). Attach additional pages if needed.

## Defendant No. 1

Name	Fort Valley State University
Job or Title ( <i>if known</i> )	Department of Legal and Governmental Services
Street Address	1005 State University Dr.
City and County	Fort Valley- Peach
State and Zip Code	Georgia 31030
Telephone Number	(877) 462-3878
E-mail Address ( <i>if known</i> )	emma.williams@fvsu.edu

## Defendant No. 2

Name	Valarie Bass
Job or Title ( <i>if known</i> )	Social and Behavioral Sciences Departmental Secretary
Street Address	1005 State University Dr.
City and County	Fort Valley - Peach
State and Zip Code	Georgia, 31030
Telephone Number	(478) 825-6230
E-mail Address ( <i>if known</i> )	bassv@fvsu.edu

## Defendant No. 3

Name	Komanduri S. Murty
Job or Title ( <i>if known</i> )	Social and Behavioral Sciences Departmental Chair
Street Address	1005 State University Dr.
City and County	Fort Valley- Peach
State and Zip Code	Georgia, 31030
Telephone Number	(478) 825-6624
E-mail Address ( <i>if known</i> )	murtyk@fvsu.edu

## Defendant No. 4

Name	Gregory Ford
Job or Title ( <i>if known</i> )	Vice Chancellor for Academic Affairs
Street Address	6400 Press Dr.
City and County	New Orleans-Orleans Parish
State and Zip Code	Louisiana, 70126
Telephone Number	(504) 286-5000
E-mail Address ( <i>if known</i> )	GFord@suno.edu

**C. Place of Employment**

The address at which I sought employment or was employed by the defendant(s) is

Name	Fort Valley state University
Street Address	1005 State University Dr.
City and County	Fort Valley-Peach
State and Zip Code	Georgia, 31030
Telephone Number	(877) 462-3878

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**II. Basis for Jurisdiction**

This action is brought for discrimination in employment pursuant to (*check all that apply*):

Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin).

*(Note: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)*

Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 to 634.

*(Note: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission.)*

Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 to 12117.

*(Note: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)*

Other federal law (*specify the federal law*):

Title IX Sex Discrimination which applies to post-secondary institutions receiving government funds

Relevant state law (*specify, if known*):

Georgia Fair Employment Act which prohibits discrimination of state governmental employees

Relevant city or county law (*specify, if known*):

**III. Statement of Claim**

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

**A. The discriminatory conduct of which I complain in this action includes (*check all that apply*):**

<input type="checkbox"/>	Failure to hire me.
<input type="checkbox"/>	Termination of my employment.
<input type="checkbox"/>	Failure to promote me.
<input type="checkbox"/>	Failure to accommodate my disability.
<input checked="" type="checkbox"/>	Unequal terms and conditions of my employment.
<input checked="" type="checkbox"/>	Retaliation.
<input type="checkbox"/>	Other acts ( <i>specify</i> ): _____

*(Note: Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court under the federal employment discrimination statutes.)*

**B. It is my best recollection that the alleged discriminatory acts occurred on date(s)**

April 2020 - October 2021

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**C. I believe that defendant(s) (*check one*):**

<input type="checkbox"/>	is/are still committing these acts against me.
<input checked="" type="checkbox"/>	is/are not still committing these acts against me.

**D. Defendant(s) discriminated against me based on my (*check all that apply and explain*):**

<input type="checkbox"/>	race	_____
<input type="checkbox"/>	color	_____
<input checked="" type="checkbox"/>	gender/sex	See attached Defendants and Disc
<input type="checkbox"/>	religion	_____
<input type="checkbox"/>	national origin	_____
<input type="checkbox"/>	age ( <i>year of birth</i> )	_____ ( <i>only when asserting a claim of age discrimination.</i> )
<input type="checkbox"/>	disability or perceived disability ( <i>specify disability</i> )	_____

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**E. The facts of my case are as follows. Attach additional pages if needed.**

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See attached complaint

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*(Note: As additional support for the facts of your claim, you may attach to this complaint a copy of your charge filed with the Equal Employment Opportunity Commission, or the charge filed with the relevant state or city human rights division.)*

#### IV. Exhaustion of Federal Administrative Remedies

A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding the defendant's alleged discriminatory conduct on (date)

November 28, 2021

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B. The Equal Employment Opportunity Commission (check one):

has not issued a Notice of Right to Sue letter.

issued a Notice of Right to Sue letter, which I received on (date) 12/15/2021.

*(Note: Attach a copy of the Notice of Right to Sue letter from the Equal Employment Opportunity Commission to this complaint.)*

C. Only litigants alleging age discrimination must answer this question.

Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding the defendant's alleged discriminatory conduct (check one):

60 days or more have elapsed.

less than 60 days have elapsed.

#### V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

See attached compensatory and punitive damages.

## VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

### A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 02/14/2022

Signature of Plaintiff



Printed Name of Plaintiff

Julius Trimble

### B. For Attorneys

Date of signing: \_\_\_\_\_

Signature of Attorney

\_\_\_\_\_

Printed Name of Attorney

\_\_\_\_\_

Bar Number

\_\_\_\_\_

Name of Law Firm

\_\_\_\_\_

Street Address

\_\_\_\_\_

State and Zip Code

\_\_\_\_\_

Telephone Number

\_\_\_\_\_

E-mail Address

\_\_\_\_\_